

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

| | | |
|--------------------------|---|-------------------|
| UNITED STATES OF AMERICA |) | |
| |) | |
| |) | |
| v. |) | No. 3:20-CR-00165 |
| |) | JUDGE CAMPBELL |
| |) | |
| CALEB JORDAN |) | |

UNOPPOSED MOTION TO CONTINUE JUNE 12, 2023 SENTENCING HEARING

Comes now the defendant, CALEB JORDAN, by and through undersigned counsel and hereby moves this Court to continue his June 12, 2023 sentencing hearing (DE 89) to a time convenient for the Court on July 6, July 10, July 11, July 24 (morning only), July 28 (afternoon only), August 1, August 3, August 22 or August 25 of 2023.

In support of this motion, Mr. Jordan submits the following:

On January 31, 2023, Mr. Jordan pled guilty to a single count alleged in the above indictment (DE 86-88). At that time, the Court set his case for a sentencing hearing on June 12, 2023 (DE 89).

One of the issues at the sentencing hearing will be the amount of restitution that the Court assesses as to Mr. Jordan. The parties have recently conferred, along with the U.S. Probation Officer, about the government's proposed restitution which is a significant amount. The defense would like additional time to look into this restitution amount, conduct some research and determine if an agreement on restitution can be reached prior to the scheduled sentencing hearing.

Moreover, an additional ground for continuance of the sentencing hearing is that the defense is in the process of obtaining additional character letters from Mr. Jordan's friends and family. Mr. Jordan has family members who reside out of state and who counsel needs to try and obtain letters from.

Undersigned counsel emphasize that Mr. Jordan's plea agreement contemplates a sentence to be served that is between fifteen and thirty years (DE 86-66). Since he has only been in custody since 2020, a continuance of his sentencing is not going to prolong his prison sentence.

The parties have conferred about available dates and would suggest the following: July 6, July 10, July 11, July 24 (morning only), July 28 (afternoon only), August 1, August 3, August 22 or August 25 of 2023. Assistant United States Attorney S. Carran Daughtrey has no objection to the instant motion.

Based upon the foregoing, undersigned counsel request that the Court grant the instant motion and continue Mr. Jordan's sentencing hearing to a date convenient for the Court when the parties are available.

Respectfully submitted,

s/ Kathleen G. Morris
KATHLEEN G. MORRIS
P.O. BOX 128091
Nashville, Tennessee 37212
(615) 440-6223
Morris @kmmorris.net

s/ Jodie A. Bell
JODIE A. BELL
Washington Square Building
214 Second Avenue North, Suite 208
Nashville, Tennessee 37201
(615) 953-4977
(615) 928-1901 facsimile
jodie@attorneyjodiebell.com

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing Motion was filed electronically and served on the following:

S. Carran Daughtrey
U.S. Attorney's Office
Middle District of Tennessee
719 Church Street, Suite 3300
Nashville, Tennessee 37203

This the 24th day of May 2023.

/s/ Jodie A. Bell
JODIE A. BELL